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Attorneys for Defendants Carol Nelson and Stanley Nelson

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

Adv. Pro. No. 08-1789 (SMB)

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation of
Bernard L. Madoff Investment Securities LLC

Plaintiff,

v.

Adv. Pro. No. 10-04377 (SMB)

CAROL NELSON, individually and joint tenant, and
STANLEY NELSON, individually and as joint tenant,

Defendants.

NOTICE OF SUBSTITUTION OF COUNSEL AND ORDER

PLEASE TAKE NOTICE that the undersigned hereby consent to the substitution of the

Becker & Poliakoff LLP for Kramer Levin Naftalis & Frankel, LLP as counsel for Carol

Nelson and Stanley Nelson (the "Defendants"). All notices given or required to be given in

this adversary proceeding shall be given to and served upon the following:

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PLEASE TAKE FURTHER NOTICE that the Defendants have knowledge of and
consent to this substitution of counsel.

April 9, 2014

**KRAMER LEVIN NAFTALIS &
FRANKEL, LLP**

*Withdrawing Attorneys for Defendants
Carol Nelson and Stanley Nelson*

April 9, 2014

BECKER & POLIAKOFF LLP

*Superseding Attorneys for Defendants
Carol Nelson and Stanley Nelson*

By: /s/ Philip Bentley

Philip Bentley
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By: /s/ Helen Davis Chaitman

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SO ORDERED:

/s/ STUART M. BERNSTEIN
HON. STUART M. BERNSTEIN
UNITED STATES BANKRUPTCY JUDGE

Dated: April 13th, 2015
New York, New York

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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CORPORATION,

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STANLEY NELSON, individually and as joint tenant,

Defendants.

DECLARATION OF HELEN DAVIS CHAITMAN

I, HELEN DAVIS CHAITMAN, declare as follows:

1. I am a member of the firm Becker & Poliakoff, LLP and a member of the Bar of this Court Pursuant to Local Civil Rule 1.4 of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York. I submit this declaration in support of the accompanying notice and proposed order substituting Becker & Poliakoff, LLP for Kramer Levin Naftalis & Frankel, LLP as counsel for Carol Nelson and Stanley Nelson (the "Defendants") in the above-captioned adversary proceeding. I also have read Local Bankruptcy Rule 2090-1 of the Local Rules of the United States Bankruptcy Court for the Southern District of New York.

2. The Defendants have requested and consent to this substitution of counsel.
3. It is not expected that any delay or prejudice will result to any party in this proceeding from this substitution of counsel.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated: New York, New York

April 9, 2014

By: /s/ Helen Davis Chaitman
Helen Davis Chaitman